



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL CENTER FOR ENVIRONMENTAL ASSESSMENT
CINCINNATI, OH 45268

SFUND RECORDS CTR
47550

OFFICE OF
RESEARCH AND DEVELOPMENT

June 12, 1996

Michael L. Dourson, Ph.D., DABT
Toxicology Excellence for Risk Assessment
4303 Kirby Avenue
Cincinnati, OH 45223

Dear Michael:

This is in reply to your letter of June 7, 1996 concerning a project with the Perchlorate Study Group concerning a re-look at EPA's *provisional* RfD which was established by our Superfund Technical Support Center in December, 1992. Such *provisional* toxicity values are issued to our regional offices as internal advice and do not represent Agency consensus and do not meet with our EPA peer review policy.

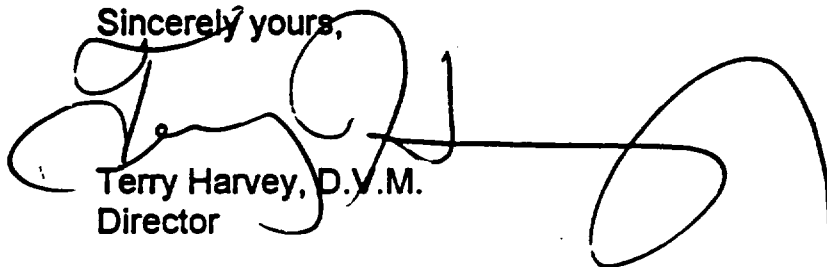
As you may know, in June, 1995 we received a submission from the Perchlorate Study Group suggesting a change in the *provisional* RfD calculations.

In 1992, EPA could not establish a Perchlorate RfD on IRIS primarily due to data deficiencies in the absence of key data sets including acceptable chronic studies to establish NOAEL/LOAEL levels and the absence of developmental toxicity data for effects observed in animal fetuses. Also, we lack a quantitative understanding of the mechanisms involved in the relationships between thyroid dysfunction and severe frank effects in the hematopoietic system seen in humans.

Because of staff shortages here, the fact that we are dealing with a *provisional* RfD, and the large uncertainties with the involved toxicities (which would likely require significant new data to understand), perchlorate doesn't seem to present a major health risk reduction priority for us as the provisional findings appear adequate without having new relevant data.

If you feel you have further data or a new assessment of existing data that may be attractive to EPA, perhaps a meeting would be productive. Please contact Karen Proffitt here if such a meeting would be useful.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Terry Harvey', with a long horizontal line extending to the right.

Terry Harvey, D.V.M.
Director

cc: Michael Girard, Perchlorate Study Group
Dave Bennett, OERR
Stan Smucker Region 9
SQIT Team
William H. Farland, ORD/NCEA